

February 28, 2003

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**Extension of Computer Reservations
Systems (CRS) Regulations**

Notice of Proposed Rulemaking

Docket No. OST-03-14484

Dated: February 28, 2003

COMMENTS OF WORLDSPAN, L.P.

Worldspan L.P. ("Worldspan") submits these comments on the Departments' proposal to extend the sunset date of 14 C.F.R. Part 255 for a period of ten months, until January 31, 2004.

Worldspan favors the prompt deregulation of the CRS industry and believes that Part 255 should terminate as soon as possible. Worldspan will take this position in its comments to be filed on March 17 in response to Department's November 15, 2002 notice of proposed rulemaking ("NPRM"). In brief, Worldspan believes that the Part 255 rules have outlived their usefulness, are no longer justified and may cause competitive harm. The NPRM acknowledges as much, at least with respect to specific rules. Accordingly, it is Worldspan's strong preference that Part 255 terminate without further extension on the current March 31, 2003 sunset date.

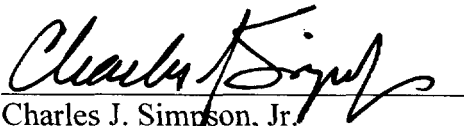
As a practical matter, however, Worldspan realizes that, having established a March 16 comment date and a May 15 reply date for the NPRM and having tentatively determined in the NPRM that some of the Part 255 rules may continue to be necessary, the Department is likely to extend Part 255 for some period beyond March 31, 2003. On the other hand, Worldspan urges the Department to consider a shorter extension than ten months. The purpose of an extension is

to allow the Department to prepare and issue a final rule before the new sunset date is reached.

With due respect to the Department and the Department's staff, Worldspan urges the Department to extend Part 255 for no more than eight months, i.e., to no later than November 30, 2003. A November 30, 2003 sunset date would give the Department over six months to issue a final rule after the submission of reply comments on May 15 and would result in the Department issuing a final rule slightly over one year after the issuance of the NPRM.

The Part 255 sunset date previously has been extended five times. If the Department again extends the sunset date, whether for the proposed ten months or any other period, the final rule implementing the extension should definitively state that there will be no further extensions of Part 255 in its current form. Furthermore, upon the conclusion of the NPRM proceeding, the Department should allow Part 255 to terminate in its entirety on the new sunset date, if any, established in this docket.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles J. Simpson, Jr.", written over a horizontal line.

Charles J. Simpson, Jr.
ZUCKERT, SCOUTT & RASENBERGER, L.L.P.
888 17th Street, N.W.
Suite 600
Washington, D.C. 20006
Counsel for Worldspan, L.P.

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of February 2003, a copy of the foregoing document. was served by electronic mail on the following:

Carl B. Nelson, Jr.
Associate General Counsel
American Airlines, Inc.
1101 Seventeenth Street, N.W.
Suite 600
Washington, D.C. 20036
E-Mail: carl.nelson@aa.com

Joanne W. Young
Counsel for America West
Baker & Hostetler, LLP
1050 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20036
E-mail: jyoung@bakerlaw.com

Robert E. Cohn
Alexander Van Der Bellen
Counsel for Delta Air Lines
Shaw Pittman LLP
2300 N Street, N.W.
Washington, D.C. 20037
E-Mail: robert.cohn@shawpittman.com;
sascha.vanderbellen@shawpittman.com

Megan Rae Rosia
Managing Director—International Affairs
and Associate General Counsel
Northwest Airlines, Inc.
901 Fifteenth Street, N.W.
Suite 310
Washington, D.C. 20005
E-Mail: megan.rosia@nwa.com

Robert W. Kneisley
Associate General Counsel
Southwest Airlines Co.
1250 Eye Street, N.W.
Suite 1110
Washington, DC 20005
E-Mail: bob.kneisley@wnco.com

Jeffrey A. Manley
Bruce H. Rabinovitz
Counsel for United Air Lines
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037
E-Mail: jmanley@wilmer.com;
brabinovitz@wilmer.com

R. Bruce Keiner, Jr.
Counsel for Continental Airlines
and Continental Micronesia
Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
E-Mail: rbkeiner@crowell.com

Donald T. Bliss
Counsel for US Airways
O'Melveny & Myers LLP
555 13th Street, N.W.
Suite 500 West
Washington, D.C. 20004
E-Mail: dbliss@omm.com

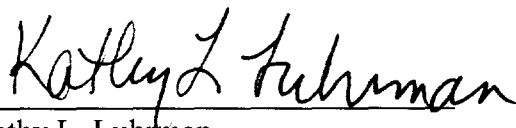
David H. Coburn
Counsel for Amadeus
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
E-Mail: dcoburn@steptoe.com

Paul M. Ruden
American Society of Travel Agents, Inc.
1101 King Street
Alexandria, VA 22314
E-Mail: paulr@astahq.com

Frank J. Costello
Paul E. Schoellhamer
Counsel for Orbitz
Zuckert, Scoutt & Rasenberger, LLP
888 Seventeenth Street, N.W.
Suite 600
Washington, D.C. 20006
E-Mail: fcostello@zsrlaw.com;
peschoellhamer@zsrlaw.com

Kenneth P. Quinn
John E. Gillick
Counsel for Sabre
Pillsbury Winthrop LLP
1133 Connecticut Avenue, N.W.
Suite 1200
Washington, DC 20036
E-Mail: kquinn@pillsburywinthrop.com;
jgillick@pillsburywinthrop.com

Carolyn Corwin
Counsel for Galileo International, L.L.C.
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
E-Mail: ccorwin@cov.com


Kathy L. Luhrman